

	1 2 3 4	ROBERT W. HENKELS, ESQ., SBN 255410 GEARY, SHEA, O'DONNELL, GRATTAN & MITCHELL, P.C. 37 Old Courthouse Square, Fourth Floor Santa Rosa, California 95404 Telephone: (707) 545-1660		
	7			
	8	UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA		
	9			
	10			
	11	RICHARDS, MAX PLOGHOROWITZ, THE	CASE NO.: 3:10-CV-01255 SI	
	12	CALGUNS FOUNDATION, INC., and THE SECOND AMENDMENT FOUNDATION,		
	13	INC., STIPULATION TO EXTEND TIME FOR DEFENDANTS CITY OF ROHNERT		
	14	Plaintiffs,	PARK, OFFICER DEAN BECKER AND OFFICER ANDREW LYSSAND TO	
	15		RESPOND TO AMENDED	
	16			
	17	JUSTICE, CITY OF ROHNERT PARK, OFFICER DEAN BECKER (RP134) and		
	18	OFFICER ANDREW LYSSAN (CO0339),		
	19	Defendants.		
LAW OFFICES OF GEARY, SHEA, O'DONNELL, GRATTAN & MITCHELL P.C.	20			
	21	TO THIS HONORABLE COURT: Pursuant to Northern District Local Rule 6-1, plaintiffs and defendants CITY OF		
	22			
	23	ROHNERT PARK, OFFICER DEAN BECKER, CITY OF COTATI, and OFFICER ANDREW		
	24	LYSSAND, by through their respective counsel hereby, agree and stipulate as follows:		
	25	1. Plaintiffs recently filed their Amended Consolidated Complaint on September 4,		
	26	2012, after this Court issued its order granting in part, and denying in part, the City of Rohnert		
	27	Park's Motion to Dismiss.		
	28			
		-1-		
		Stipulation to Extend Time for Defendants to Respond to Amended Consolidated Complaint		

	1	2. In light of plaintiffs' and defendants' current settlement negotiations, plaintiffs and			
	2	defendants hereby agree to extend defendants' last day to respond to plaintiffs' Amended			
	3	Consolidated Complaint.			
	4	3. Accordingly, defendants CITY OF ROHNERT PARK, OFFICER DEAN BECKER,			
	5	CITY OF COTATI, and OFFICER ANDREW LYSSAND shall have until October 16, 2012 to			
	6	respond to plaintiffs' Amended Consolidated Complaint.			
	7	4. The parties are currently scheduled to appear for a Case Management Conference on			
	8	November 2, 2012. No trial date has been set. This extension does not interfere with any			
	9	previously scheduled deadline set by this Court.			
	10	IT IS SO STIPULATED.			
	11	DATED: September 21, 2012	LAW OFFICES OF DONALD KILMER		
	12				
	13		By		
	14		DONALD KILMER Attorneys for Plaintiffs		
	15		BRENDAN JOHN RICHARDS, THE CALGUNS FOUNDATION, INC., and		
	16		THE SECOND AMENDMENT FOUNDATION, INC.		
	17				
	18	DATED: September 21, 2012	GEARY, SHEA, O'DONNELL, GRATTAN & MITCHELL, P.C.		
	19		,		
	20		By		
LAW OFFICES OF GEARY, SHEA, O'DONNELL, GRATTAN & MITCHELL	21		ROBERT W. HENKELS Attorneys for Defendants		
	22		CITY OF ROHNERT PARK, OFFICER DEAN BECKER, CITY OF		
	23		COTATI, and ANDREW LYSSAND		
	24				
	25				
	26				
	27				
P.C.	28	3 <u> </u>			
			- 2 -		